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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 25, 2007

Mr. Michael C. Carter, Director
Office of Environment
U.S. Department of Transportation - Maritime Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: Hull Cleaning Operations on the Beaumont Reserve Fleet.

Dear Mr. Carter:

I received your letter requesting a determination of whether the hull cleaning activities at the Beaumont Reserve Fleet require a wastewater permit.

The Texas Water Code requires entities to obtain an authorization from the Texas Commission on Environmental Quality (TCEQ) to dispose of wastewater or engage in activities that will cause pollution or introduce pollutants into water in the state. As described in your letter, the hull cleaning operation will not generate a wastewater. Also, the information submitted with your letter indicates that no chemicals or detergents will be used during the cleaning operations, that non-metal brushes will be used, that hull coatings and scale will not be disturbed, that only soft growth will be removed, that only vessels from Texas waters will be cleaned, and that additional best management practices will be implemented.

For the reasons listed above, we have determined that no wastewater permit is required to perform the hull cleaning activities as described in your May 21, 2007 letter. If these circumstances should change, please contact me to determine if the change would result in the requirement for an authorization from the TCEQ.

Please contact me if you have any questions. I may be reached at (512) 239-2369.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly Holligan", is written over a horizontal line.

Kelly Holligan
Industrial Team (MC-148)
Water Quality Division

KH/cs